

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CARE INVESTMENT TRUST, INC.,

Plaintiff,

-v.-

**JEAN-CLAUDE SAADA; CAMBRIDGE ONALP,
INC.; CAMBRIDGE NASSAU BAY GP LLC; 6000
GREENVILLE, INC.; ALLEN MOB, INC.; 5280
MEDICAL DRIVE, INC.; CAMBRIDGE GORBUTT
MOB, INC.; CAMBRIDGE TARRANT, INC.; CHMP
MANAGER, LLC; CAMBRIDGE B/R, INC.;
CAMBRIDGE-GREENVILLE DALLAS, LLC; PMC
CAMBRIDGE OF PLANO, LTD; CAMBRIDGE-
CROWN ATRIUM LLC; and CAMBRIDGE NORTH
TEXAS HOLDINGS, LLC,**

Defendants.

No. 3:09-cv-02256-K

**JEAN-CLAUDE SAADA; CAMBRIDGE ONALP,
INC.; CAMBRIDGE NASSAU BAY GP LLC; 6000
GREENVILLE, INC.; ALLEN MOB, INC.; 5280
MEDICAL DRIVE, INC.; CAMBRIDGE GORBUTT
MOB, INC.; CAMBRIDGE TARRANT, INC.; CHMP
MANAGER, LLC; CAMBRIDGE B/R, INC.;
CAMBRIDGE-GREENVILLE DALLAS, LLC; PMC
CAMBRIDGE OF PLANO, LTD; CAMBRIDGE-
CROWN ATRIUM LLC; and CAMBRIDGE NORTH
TEXAS HOLDINGS, LLC,**

Counterclaim Plaintiffs,

-v.-

**CARE INVESTMENT TRUST, INC.; CIT
HEALTHCARE, LLC; FLINT D. BESECKER; ERC
SUB, LP; and ERC SUB, LLC,**

**Counterclaim and Third-Party
Defendants.**

**STIPULATION FOR EXTENSION
OF TIME AND ACCEPTANCE OF SERVICE**

IT IS HEREBY STIPULATED AND AGREED by the parties hereto that:

1. The time for Counterclaim Defendant Care Investment Trust, Inc. (“Care”) and Third-Party Defendants CIT Healthcare, LLC; Flint D. Besecker; ERC Sub, LP; and ERC Sub, LLC (“Third-Party Defendants”) to answer or otherwise respond to the Counterclaims and Third-Party Complaint of Counterclaim Plaintiffs Jean-Claude Saada; Cambridge Onlap, Inc.; Cambridge Nassau Bay GP LLC; 6000 Greenville, Inc.; Allen MOB, Inc.; 5280 Medical Drive, Inc.; Cambridge Gorbett MOB, Inc.; Cambridge Tarrant, Inc.; CHMP Manager, LLC; Cambridge B/R, Inc.; Cambridge-Greenville Dallas, LLC; PMC Cambridge of Plano, Ltd.; Cambridge-Crown Atrium LLC; and Cambridge North Texas Holdings, LLC (“Counterclaim Plaintiffs”) (Dkt. No. 24) is hereby extended to March 5, 2010.

2. The time for Care to respond to the Motion to Dismiss Plaintiff’s Fourth and Fifth Causes of Action (Dkt. No. 39) is hereby extended to March 5, 2010.

3. Care and the Third-Party Defendants hereby authorize the undersigned counsel at McDermott Will & Emery LLP to accept service of the Counterclaims and Third-Party Complaint of the Counterclaim Plaintiffs. Care and the Third-Party Defendants further attest that such service has been effectuated, and that they have been properly served with the aforementioned Counterclaims and Third-Party Complaint.

Dated: February 5, 2010

Respectfully submitted,

/s/ Ernest E. Figari, Jr.
Ernest E. Figari, Jr.
Texas Bar No. 06983000
FIGARI & DAVENPORT, L.L.P.
3400 Bank of America Plaza
901 Main Street, Suite 3400
Dallas, Texas 75202-3796
Tel. 214.939.2000
Fax 214.939.2090

/s/ Robert M. Cohan
Robert M. Cohan
Texas Bar No. 04506600
JACKSON WALKER L.L.P.
901 Main Street, Suite 6000
Dallas, Texas 75202
Tel. 214.953.6046
Fax 214.661.6612

/s/ Jason A. Levine
Bobby R. Burchfield (*pro hac vice*)
Jason A. Levine (*pro hac vice*)
McDERMOTT WILL & EMERY LLP
600 Thirteenth Street, N.W.
Washington, D.C. 20005-3096
Tel. 202.756.8000
Fax. 202.756.8087

/s/ Richard A. Rosen
Richard A. Rosen (*pro hac vice*)
PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, N.Y. 10019-6064
Tel. 212.373.3000
Fax. 212.757.3990

*Attorneys for Plaintiff and Counterclaim
Defendant Care Investment Trust, Inc. and for
Third-Party Defendants CIT Healthcare, LLC;
Flint D. Besecker; ERC Sub, LP; and ERC Sub,
LLC*

*Attorneys for Defendants and Counterclaim
Plaintiffs Jean-Claude Saada; Cambridge
Onlap, Inc.; Cambridge Nassau Bay GP LLC;
6000 Greenville, Inc.; Allen MOB, Inc.; 5280
Medical Drive, Inc.; Cambridge Gorbett MOB,
Inc.; Cambridge Tarrant, Inc.; CHMP
Manager, LLC; Cambridge B/R, Inc.;
Cambridge-Greenville Dallas, LLC; PMC
Cambridge of Plano, Ltd.; Cambridge-Crown
Atrium LLC; and Cambridge North Texas
Holdings, LLC*

CERTIFICATE OF SERVICE

I hereby certify that all attorneys deemed to accept service of the above-referenced document electronically will be notified via the Court's CM/ECF system and all others will be notified via certified mail, return receipt requested, on this the 5th day of February, 2010.

/s/Ernest E. Figari, Jr. _____

Ernest E. Figari, Jr.